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April 30, 1999

Mr. L. Robert Shelton  
Associate Administrator for  
Safety Performance Standards  
National Highway Traffic Safety Administration  
400 Seventh Street, SW  
Washington, DC 20590

Dear Mr. Shelton:

**REFERENCE: School Buses - Hydraulic and Electric Brake Systems (FMVSS 105) and Air Systems (FMVSS 121) - Notice of Request for Comments [Docket 99-5119, Notice 1]. – 5**

The Truck Manufacturers Association (TMA), whose members include all of the major U.S. and Canadian manufacturers of medium and heavy-duty trucks (greater than 8845 kilograms (19,500 pounds) gross vehicle weight rating) submits the following comments in response to the subject Notice of Request for Comments. TMA member companies include: **Ford Motor Company, Freightliner Corporation, General Motors Corporation, Mack Trucks, Inc., Navistar International Transportation Corp., PACCAR Inc, Volvo Trucks North America, and Western Star Trucks Inc.**

NHTSA requests comments on whether to grant a petition to amend FMVSS 105, Hydraulic and Electric Brake Systems, and FMVSS 121, Air Brake Systems, to require that school buses be equipped with a parking brake warning system that activates when the school bus engine is turned off, the transmission is in neutral, and the parking brake has not been applied. In addition, one of the eleven specific questions for comment asks “[S]hould NHTSA consider expanding the application of the proposed (or alternative) warning system to include vehicles other than school buses, for example, all buses, or all medium and heavy vehicles?”

TMA believes that sufficient data do not exist to **justify** the requirement of the proposed warning system for either school buses or medium and heavy-duty trucks. Neither the petitioner nor the agency have provided data on the frequency of school bus or medium and heavy-duty truck **rollaway** incidents or on the effectiveness of the proposed warning system. TMA, therefore, believes that the agency should deny the petition. TMA further believes that the proposed, or alternative warning systems, should not be applied to medium and heavy-duty trucks. Unlike school bus drivers, truck drivers, as a whole, tend to be full time employees who are more highly trained and operate the same type of vehicle every day. Still, there may be merit in increasing emphasis in driver training programs to reinforce driver’s understanding of the fact that vehicles in “neutral” have the potential to roll away and the importance of engaging the parking brake.

TMA staff are available to provide additional information the agency may require.

Sincerely,

William A. **Leasure**, Jr.  
Executive Director

cc: Docket - 10 copies  
Jeff Woods